

4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

United States of America,

Plaintiff,

Criminal No. 11-cr-20129

v.

HON. ROBERT H. CLELAND

Violations:

D-24 SCOTT THOMAS PERKINS,
a/k/a "Scooter, Scotty P,"

21 U.S.C. §§ 846, 841(a)(1)

Defendant.

FIFTH SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT 1

(21 U.S.C. §§ 846, 841(a)(1) – CONSPIRACY TO MANUFACTURE, DISTRIBUTE, AND POSSESS WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE)

That from in or about 2002, through June 13, 2012, in the Eastern District of Michigan, and elsewhere, SCOTT THOMAS PERKINS, defendant herein, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with other persons, whose names are both known and unknown, to commit offenses against the United States, that is, to distribute and to possess with the intent to distribute a hydrocodone, combination product, that is, Vicodin, a

2014 SEP -9 P 2:53

FILED

U.S. DIST. COURT
EAST. DIST. MICHIGAN
DETROIT

Schedule III controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 846.

FORFEITURE ALLEGATIONS
(21 U.S.C. § 853)

1. The allegations set forth above in this Second Superseding Information are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of violating Title 21, United States Code, Sections 846, 841(a)(1), as alleged in this Second Superseding Information, SCOTT THOMAS PERKINS, defendant herein, shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

3. Substitute Assets: Pursuant to Title 21, United States Code, Section 853(p), defendant shall forfeit any of his other property, real or personal, up to the value of property described above, if, by any act or omission of the defendant, the property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 21, United States Code, Section 853(p), and Rule 32.2, Federal Rules of Criminal Procedure.

4. Money Judgment. Upon conviction of the violations alleged in this Second Superseding Information, the Government will seek a forfeiture money judgment against defendant in an amount representing the total amount of proceeds obtained as a result of defendant's violation of Title 21, United States Code, Sections 846, 841(a)(1).

BARBARA L. McQUADE
United States Attorney

s/Saima S. Mohsin
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ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 11-20129
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. D-24 Scott Thomas Perkins

County where offense occurred : Macomb

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]
☐ Indictment/ ☒ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information


Superseding to Case No: 11-20129 **Judge:** Cleland

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☒ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Scott Thomas Perkins	21 U.S.C. §§ 846, 841(a) (1)	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 9, 2014
Date


 SAIMA MOHSIN
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.